

64-10
Part 37,39
Broughton
27 Mar 2000

MEMORANDUM FOR HQ AFMC/PK

January 12, 2000

FROM: HQ AFMC/SC

SUBJECT: Contractor Access to Air Force Computer Systems

1. The attached memorandum from HQ USAF/XOFI addresses the issue of contractor access to Air Force computer systems and information. Everyone on the acquisition teams must ensure bidders are aware of the National Agency Check requirement for access to AFMC unclassified computer systems.
2. It is important that contracting offices throughout the command are aware of this requirement so that it will be incorporated into the pre-award documentation and enforced throughout the duration of the contract. The necessity for this safeguard, and procedures for obtaining it, must be clear to everyone.
3. Local contracting office knowledge of and compliance with the attached memorandum is an important part of our efforts to secure our computer systems and the information contained on those systems. Questions can be directed to Colonel Kevin Kirsch, AFMC CSO/SCO, 71690.

/s/

DEBRA L. HALEY
Director
Communications and Information

Attachment:
USAF/XOFI Memorandum, 13 Aug 99

2000-4-6



DEPARTMENT OF THE AIR FORCE
WASHINGTON, DC

Office of the Secretary

13 Aug 99

MEMORANDUM FOR SEE DISTRIBUTION

FROM: HQ USAF/XOFI
1394 Air Force Pentagon
Washington, DC 20330-1340

SUBJECT: Automated Information Systems - Interim Process

There is currently a lot of work underway to improve security of classified and unclassified automated information systems (AIS). OSD is coordinating an appendix to DoD 5200.2-R, Personnel Security Program, which will fully implement the investigative provisions of OMB Circular A-130, Management of Federal Information Resources and the Computer Security Act of 1987. For unclassified systems, these requirements will increase the number of investigations needed to ensure the trustworthiness of persons afforded access. The DoD 5200.2-R para 3-614 and Appendix K, currently require, as a minimum, a National Agency Check for civilians and contractors and an Entrance National Agency Check for military members in AIS III positions. This category includes all other positions involved in Federal computer activities and has been the most challenging in meeting the investigative requirements. Since military and most appropriated fund civilian employees will meet minimum requirements for access to unclassified AIS due to the investigative requirements required for suitability reasons (ENTNAC or NACIC), this new investigation requirement will primarily affect our nonappropriated fund civilians and contractors. When individuals are assigned to positions requiring additional investigation (AIS I & II), initiate the appropriate investigation in accordance with DoD 5200.2-R, para 3-614 and Appendix K, if applicable.

Investigation completion times have slowed considerably in recent months. While the Defense Security Service (DSS) works through system upgrade difficulties, OSD(C31) has approved the following interim measures:

New Military/New Civilian/Contractor/Summer Hire/Seasonal Employee:
All individuals who are granted interim access must receive mandatory information assurance training, prior to access and this training must be documented. In addition, Systems Administrators must implement measures to limit access to the information required to conduct assigned duties; supervisors and or commanders must ensure increased monitoring of the individual's ATS access; and the Designated Approving Authority must approve system.

New Military Member: Military officials make suitability determinations for enlisted and officer accessions. AETC also conducts extensive screening in addition to the ENTNAC (enlisted) and or National Agency Check, Local Agency Checks and Credit Check (NACLC) (officers). Pending completion of the suitability investigation by DSS:

Commanders may grant interim access based on the suitability determination and verification that the required investigation has been initiated.

New Appropriated Fund Civilian Employee: (appointment expected to last over 180 days): Office of Personnel Management (OPM) requires all new civilian employees to complete the OF 306, Declaration of Federal Employment, and the investigation form (SF-85 or SF 85P) for initiation of the National Agency Check with Written Inquiries and Credit Check (NACIC) prior to the appointment. These forms request background information concerning arrests, violations of the law, employment, and financial history. The Civilian Personnel Flight (CPF) or OPM, as appropriate, will make a preliminary suitability determination for Federal employment according to 5 CFR Part 731, Suitability, based on the information provided on these forms. Applicants found not suitable are not hired. Employees found suitable for Federal employment are eligible for appointment and may be granted interim access to Federal computer activities pending completion of the required NACIC. Pending completion of the suitability investigation by OPM:

Unit security managers initiate the local files check (LFC); and,

Security Forces verify the LFC has been conducted, verify with CPF that the required investigation has been initiated and advise the commander accordingly.

Commanders may grant interim access based on a preliminary suitability determination by the CPF, the investigation initiated, and confirmation that the necessary training and control measures have been taken by the supervisor and or systems administrator.

New Nonappropriated Fund, (NAF) Civilian Employee: (appointment expected to last over 180 days): Air Force Services requires all new NAF civilian employees to complete the OF 306, Declaration of Federal Employment. Investigation forms (SF-85P or SF 86) for initiation of the National Agency Check (NAC) are required for locally identified positions, all child care and youth positions, and all positions requiring access to an AIS prior to appointment. These form request background information concerning arrests, violations of the law, employment and financial history. For those positions where the NAC is required due to access to AIS, the Human Resources Office (HRO) will make a preliminary suitability determination for Federal employment accordingly to 5 CFR Part 731, Suitability, based on the information provided on these forms. Applicants found not suitable are not hired. Employees found suitable for Federal employment are eligible for appointment and may be granted interim access to Federal computer activities pending completion of the NAC. The following conditions must be met:

Unit security managers initiate the LFC; and,

Security Forces verify the LFC has been conducted; the required investigation has been initiated and advise the commander accordingly.

Commanders may grant interim access based on a preliminary suitability determination by the HRO, the investigation initiated, and confirmation that the necessary training and controls have been taken by the supervisor and or the systems administrator.

Contractors:

Unit security managers initiate the LFC; and,

Security Forces verify the LFC has been conducted, submit the NAC, and advise the commander accordingly.

Commanders may grant interim access based on a LFC and initiation of the investigations.

Seasonal or Summer Hire Employees (Appropriated and Nonappropriated Fund Employees) (appointment expected to last under 180 days): DoD 5200.2-R, para 3-201, does not require an investigation for persons appointed to a nonsensitive position when employment is for intermittent, seasonal, per diem, or on a temporary basis and employment is not to exceed an aggregate of *180 days* in either a single continuous appointment or series of appointment. Much discussion has risen concerning temporary employees access to unclassified Internet capable AIS, since a NAC/NACIC is not conducted as it is for permanent employees. Therefore, the following supplemental measures have been established for temporary employees who require access to unclassified AIS in order to perform assigned duties in support of Air Force missions:

OPM (and Air Force Services for NAF employees) require all seasonal or summer hire employees to complete the OF 306. The CPF/HRO will make a suitability determination for Federal employment according to 5 CFR Part 731, Suitability, based on the information provided on this form and employment, education and residency history provided on the employment application. Applicants found not suitable are not hired. Employees found suitable for Federal employment are eligible for appointment and may be provided access to Federal computer activities, if the following conditions are met:

Unit security managers initiate the LFC; and,

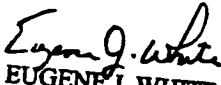
Security Forces verify the LFC has been conducted and advise the commander accordingly.

Commanders may grant interim access based on a preliminary suitability determination by the CPF/HRO, and confirmation that the required training and controls have been taken by the supervisor and the systems administrator.

This guidance will be incorporated in the AFI 31-501, Personnel Security Program Management, AF/SC will provide additional guidance for individuals who are granted interim AIS access in a revision to AFSSI 5027, Network Security Policy.

Our POC on this matter is Ms. Jean Smith, AF/XOFI (personnel security),

DSN 425-0011, and Mr. Barry Washington, AFCIC/SYIP (information system security),
DSN 425-6172.


EUGENE J. WHITE, JR.
Chief, Information Security Division
Directorate of Security Forces

cc:

OASD (C3I)
AF/DPFC
497 IG/INS
AFCIC/CV
ALMAJCOM/FOA/SC/SV

NAC CLAUSE (to be included in SOW and/or "900" clause by C.O.) 1

Each Contractor requiring access to Government automated information systems will require a National Agency Check (NAC), as a minimum, in accordance with DoD 5200.2-R. Each contractor employee requiring a NAC shall submit to 78 SFS/SFAP one copy of a completed SF85P, Questionnaire for Public Trust Positions, accomplished on the Electronic Personnel Security Questionnaire (EPSQ). Security Forces personnel will then fingerprint the employee on a DD Form 258, Fingerprint Card. (Note: To obtain an EPSQ, visit the Defense Security Service web site at <http://www.dis.mil> and download the Subject Edition. Or as an alternative, bring two blank disks to SFAP and copies of the EPSQ can be made.)

Once the contractor has accomplished the necessary steps to obtain a NAC and 78 SFS/SFAP has forwarded the necessary information to the Defense Security Service for the background investigation, interim access can be granted to any individual whose company or government organization provides a statement, signed by a member of company management or a government official, certifying the following:

- a. The individual has processed the necessary documentation for a background investigation through their company or through government channels.
- b. Access to a government automated information system (AIS) or Email account is required in the performance of official duties.
- c. It is understood that access will be terminated if the investigation results in unfavorable information.
- d. The individual granted interim access will complete AIS training required by AFI 33-204 within 30 days of access.

This statement, attached to the form (DISA Form 43 or similar form) requesting access to an AIS, will be sufficient for interim access for up to one year.

Upon completion of the subsequent investigation suitability of employment review, 78 SFS/SFAP will notify the applicable organization for the employee receiving a favorable/unfavorable NAC by forwarding a letter to the requesting activity. If the results of the NAC are unfavorable, the activity commander must determine access requirements and eligibility.

When the Government is in the process of conducting a NAC investigation on an employee and that individual's employment is terminated before the investigation is completed, 78 SFS/SFAP will be notified by the individual's supervisor.

POC: 78 SFS/SFAP, 926-3239